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December 2, 2024

By Electronic Mail

Hon. Donovan W. Frank
Hon. Dulce J. Foster
United States District Court for the District of Minnesota
Warren E. Burger Federal Building and U.S. Courthouse
316 North Robert Street, Suite 100
St. Paul, MN 55101
frank_chambers@mnd.uscourts.gov
foster_chambers@mnd.uscourts.gov

Re: ***In re: Change Healthcare, Inc. Customer Data Sec. Breach Litig.*, 0:24-md-03108-DWF-DJF, Request to Postpone Status Conference**

Dear Judges Frank and Foster:

Defendants respectfully request that the December 4, 2024 status conference be moved to a later date due to the unforeseen illnesses of multiple members of the defense team, including lead counsel. All three members of the Change Defense team who attended the Court's initial status conference in September are either ill (including with Covid) or have been advised not to fly by a medical professional for other medical issues. As a result, Defendants respectfully request that the conference be postponed at which time Defense counsel would no longer be contagious and would be happy to address any of the issues identified in PTO 4. Defense counsel has met and conferred with lead counsel for Plaintiffs regarding this request and counsel does not object.

The parties can be available on December 16-17 or at the Court's previously scheduled January conference on January 16, 2025. For scheduling purposes, Plaintiffs' Consolidated Amended Complaints are due January 15, 2025. Defense counsel will also provide an updated status of all state court cases no later than tomorrow.

Respectfully submitted,

/s/ *Allison Ryan*

Allison Ryan

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Counsel for Defendants Change Healthcare Inc., UnitedHealth Group Incorporated, Optum, Inc., UnitedHealthcare, Inc., and Change Healthcare Solutions LLC

cc: Dan Gustafson, Plaintiffs' Interim Lead Counsel